

# EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ZHU ZHAI HOLDINGS LIMITED and )  
PETER PUI TAK LEE, )  
Plaintiffs, )  
v. ) Case No. 20-cv-4985  
STEVEN IVANKOVICH, )  
Defendant. )

**ALIAS CITATION TO DISCOVER ASSETS TO STEVEN IVANKOVICH**

ZU ZHAI HOLDINGS LIMITED and  
PETER PUI TAK LEE

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Judgment Creditors

v.

STEVEN IVANKOVICH

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Judgment Debtor

Judgment Debtors' last known address:

STEVEN IVANKOVICH  
382 NE 191st Street  
Miami, FL 33179

Judgment Creditors' Address c/o Their Attorney:

Amir Tahmassebi, Bar #6287787  
Konicek & Dillon, P.C.  
70 W. Madison, Suite 2060  
Chicago, IL 60602  
(312) 328-9166 (Direct)  
(630) 262-9659 (Fax)  
amir@konicekdillonlaw.com

Steven Lammers, Bar #6294413  
Mandel Rauch & Lammers, P.C.  
704 Adams Street, Suite F  
Carmel, IN 46032  
(317) 581-7440 (Direct)  
(317) 848-6197 (Fax)  
slammers@mhmlaw.com

A judgment in favor of ZU ZHAI HOLDINGS LIMITED and PETER PUI TAK LEE against STEVEN IVANKOVICH in the amount of FOUR MILLION FIVE HUNDRED AND THREE THOUSAND EIGHT HUNDRED FORTY-TWO DOLLARS (\$4,503,842.00), plus post-judgment interest, was entered August 17, 2021, in the United States District Court for the Northern District of Illinois. **The amount of the unpaid judgment as of December 28, 2021 is \$4,651,543.34.**

Attorneys for Judgment Creditors:

Amir Tahmassebi, Bar #6287787  
Konicek & Dillon, P.C.  
70 W. Madison, Suite 2060  
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**Name of party to receive citation:**

**STEVEN IVANKOVICH**  
c/o Jason M. Wandner  
**100 N. Biscayne Boulevard, Suite 1607**  
**Miami, FL 33132**  
Email: [jason@wandnerlaw.com](mailto:jason@wandnerlaw.com)

NOTICE: You are directed to appear in court to be examined for the purpose of allowing the judgment creditor to discover income and assets belonging to you or in which the judgment debtor has an interest as set forth below:

**Hearing Date/Time/Location**

**April 19, 2022, at 10:30 a.m.**  
**Courtroom 1241, Honorable Sharon Johnson Coleman**  
**U.S. District Court for the Northern District of Illinois**  
**219 South Dearborn Street**  
**Chicago, IL 60604**

The Citation was issued on the basis of a judgment against the judgment debtor and in favor of the judgment creditors in the amount stated above.

NOTICE: The court has issued a Citation against the party named above, The Citation directs that person to appear in court to be examined for the purpose of allowing the judgment creditor to discover income and assets belonging to the judgment debtor or in which the judgment debtor has an interest. The Citation was issued on the basis of a judgment against the judgment debtor and in favor of the judgment creditors in the amount stated above. On or after the court date stated above, the court may compel the application of any discovered accounts toward payment of the judgment. If you do not answer or come to the court date listed above, the judge may do one of two things: 1) issue a rule to show cause, or 2) enter a conditional judgment. If there is a rule to show cause court date, you will have to explain why you did not come to court on the court date and why you should not be found in contempt of court. If you do not come to the rule to show cause on the set court date, the judge may find you in contempt, and you might be arrested and jailed. If the court enters a conditional judgment, you will have 30 days to answer or appear. If you fail to do so, then the court may enter a final judgment against you.

**At your *Citation* hearing, you will be asked about your property and income. You will be sworn to tell the truth.**

**You are ordered to bring these documents at the court date:**

- Federal and state income taxes for the last 2 years; The Federal Tax Returns of 2021 and 2020 are on extension and have not been filed.
- Recent pay stubs or proof of income; None
- Bank records; I have no bank accounts in my name.
- Title to motor vehicles; I have no vehicle title.
- Deed to any property you own; **AND** I own property as tennant by entirety with wife Jeanette located at 235 W. Menomonee Street P.I. N. 14-33-413-004-000 and 14-33-413-017 -0000. I do not jave a copy of the deed. My counsel will try to secure a copy and provide it to counsel
- Insurance Policies. None (assuming this request if for information about life insurance).

The amount of income or assets that may be applied toward the judgment is limited by federal and Illinois law. **YOU HAVE THE RIGHT TO ASSERT STATUTORY EXEMPTIONS AGAINST CERTAIN INCOME OR ASSETS OF THE JUDGMENT DEBTOR WHICH MAY NOT BE USED TO SATISFY THE JUDGMENT IN THE AMOUNT STATED ABOVE:**

- (1) Money or belongings up to \$4,000 (“wildcard exemption”);
- (2) Social Security and SSI benefits;
- (3) Public assistance benefits;
- (4) Child support;
- (5) Unemployment compensation benefits;
- (6) Worker’s compensation benefits;
- (7) Veteran’s benefits;
- (8) Circuit breaker property tax relief benefits;
- (9) Your equity interest, up to \$2,400, in any one motor vehicle;
- (10) Your equity interest, up to \$1,500, in any professional books, or tools of trade;
- (11) Pension and retirement benefits and refunds; **AND**
- (12) Your equity interest, up to \$15,000.00 in the house in which you live.

**There are specific exemptions for wages.** Under Illinois law, the amount of wages that may be taken to pay a judgment is limited to the lower of: 1) 15% of your gross wages, or 2) the amount by which your weekly wages, after deductions for taxes and other allowed deductions, is greater

than 45 times the minimum wage (currently \$371.25 for one week; \$742.50 for two weeks; \$804.37 for semi-monthly wages; and \$1,608.75 for a month). Federal law allows the lesser of 1) 25% of disposable wages; or 2) the amount by which disposable earnings for a week is greater than 30 times the federal minimum wage.

The judgment debtor may have other possible exemptions under the law.

I certify this Citation Notice was sent by e-mail transmission, to judgment debtor, Steven Ivankovich, via his attorney, Jason Wandner, on April 13, 2022.

I certify that everything in this *Citation to Discover Assets to Steven Ivankovich* is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law.

/s/ Amir R. Tahmassebi

Preparer's Signature

Preparing Attorney's Name:  
Amir Tahmassebi, Bar #6287787  
Konicek & Dillon, P.C.  
70 W. Madison, Suite 2060  
Chicago, IL 60602  
(312) 328-9166 (Direct)  
(630) 262-9659 (Fax)  
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\_\_\_\_\_  
CLERK, UNITED STATES DISTRICT COURT,  
NORTHERN DISTRICT OF ILLINOIS

THOMAS G. BRUTON, CLERK



(By) DEPUTY CLERK



April 13, 2022

\_\_\_\_\_  
DATE



☐ General Assistance (GA)  
☐ Social Security  
☐ Supplemental Security Income (SSI)  
☐ Food Stamps (SNAP)  
☐ State Children & Family Assistance  
☐ Temporary Assistance to Needy Families (TANF)  
☐ Aid to the Aged, Blind and Disabled (AABD)  
☐ Unemployment  
☐ Pension  
☐ Other: \_\_\_\_\_

**5. I own real estate:** ☒ **Yes** ☐ **No**

a. I own property at: 235 West Menonee Street and 234 Willow Street Chicago Il. 00614 Note 1 property owned with

*Street Address, Apt.*

note a foreclosure is case is pending in Cook County Ill. on this property

\_\_\_\_\_

*City* *State* *Zip*

☒ There is a mortgage on my property. Note two mortgages first mortgage being foreclosed, and foreclosure judgment entered.

b. I own property at: \_\_\_\_\_

*Street Address, Apt.*

\_\_\_\_\_

*City* *State* *Zip*

☐ There is a mortgage on my property.

**6. I have checking, savings, money market, certificates of deposit, safety deposit boxes, or other bank or credit union accounts:** ☐ **Yes** ☒ **No**

Name of Bank or Institution	Names on Accounts	Account Type	Balance
1.			\$
2.			\$
3.			\$
4.			\$

**7. I have motor vehicles (Cars, boats, trailers, motorcycles, etc.):** ☐ **Yes** ☒ **No**

Year, Make and Model	Title in the Name of	Monthly payment	Balance
1.		\$	\$
2.		\$	\$
3.		\$	\$
4.		\$	\$

I certify that everything in the *Answer to Citation Proceeding* is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law.

  
\_\_\_\_\_  
*Your Signature*

Steven Ivankovich  
\_\_\_\_\_  
*Print Your Name*

791 Crandon Blvd  
\_\_\_\_\_  
*Street Address*

Key Biscayne, FL 33149  
\_\_\_\_\_  
*City, State, ZIP*

3129611981  
\_\_\_\_\_  
*Telephone*

**\*\*\*Mail or hand-deliver a copy of this completed *Answer* to the Clerk, United States District Court, Northern District Illinois, 219 South Dearborn Street, Chicago, Illinois 60604, Counsel for Judgment Creditors and to Judgment Debtor (addresses above)\*\*\***